

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS PLC)	
and BT AMERICAS, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 22-01538-CJB
)	
PALO ALTO NETWORKS, INC.,)	
)	
Defendant.)	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Scheduling Order (D.I. 62), Plaintiffs British Telecommunications plc and BT Americas, Inc. (collectively, “Plaintiffs”) and Defendant Palo Alto Networks, Inc. (“Defendant”) hereby file this Joint Claim Construction Chart for terms found within U.S. Patent No. 7,159,237.

Section I below sets forth a list of claim terms and their respective constructions on which the parties have agreed. **Section II** sets forth the disputed claim terms that need to be briefed during claim construction, the constructions proposed by the Plaintiffs and Defendant, and the intrinsic evidence the parties believe supports their proposed constructions. Plaintiffs and Defendant reserve the right to rely on any intrinsic evidence cited by the other party. **Section III** sets forth the terms Defendant identified as indefinite, which do not need to be briefed during claim construction. A copy of the **'237 Patent is attached as Exhibit A** and those portions of the intrinsic record relied upon are attached as Exhibits B through X.

The parties reserve their right to amend and/or supplement their positions in this Joint Claim Construction Chart with additional intrinsic evidence in their claim construction briefs to rebut positions taken by the other party.

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Dated: February 23, 2024

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JOINT CLAIM CONSTRUCTION CHART

I. Terms Not in Dispute

No.	Term for Construction	Agreed Construction
1.	“dynamically” <u>Claim(s):</u> 1, 18, 26	During actual operation, rather than offline.
2.	“status data” <u>Claim(s):</u> 1-2, 6, 10, 14, 16, 18, 24-26	data extracted from or generated about the traffic or system processing it that is informative as to the status of the network and its components
3.	“probe” <u>Claim(s):</u> 1, 6, 10, 14, 18, 24-26	a component that collects data from one or more network components to which it is attached, filters or otherwise analyzes the data that has been collected, transmits noteworthy information, and receives feedback in order to update its capabilities of analysis
4.	“A method of operating a probe as part of a security monitoring system for a computer network, comprising:” <u>Claim(s):</u> 1	Preamble is limiting.
5.	“an analyst associated with said [security monitoring system] / [secure operations center]” <u>Claim(s):</u> 1, 18, 26	Personnel specializing in the analysis of network attacks.

II. Terms in Dispute, which need to be briefed

No.	Term for Construction	Plaintiffs' Construction	Plaintiffs' Intrinsic Evidence	Defendant's Construction	Defendant's Intrinsic Evidence
1.	<p>“post-filtering residue, wherein the post-filtering residue is data neither discarded nor selected by filtering”</p> <p><u>Claims:</u> 1, 18, 26</p>	status data that undergoes negative and positive filtering, but is neither discarded by such negative filtering nor selected by such positive filtering	<p><u>'237 Patent (Ex. A):</u> Fig. 1, Fig. 2, 4:37-5:43, 8:35-9:35, Claim 1, Claim 18, Claim 26</p> <p><u>'237 Patent Prosecution History Excerpts (Ex. C):</u>¹ Jan. 19, 2001 Application as Filed; March 26, 2004 Non-Final Rejection; July 29, 2004 Amendment; Jan. 13, 2005 Final Rejection; April 13, 2005 Amendment Under 37 C.F.R. 1.116; April 28, 2005 Advisory Action; July 6, 2005 Second Amendment Under 37 C.F.R. 1.116; Oct. 3, 2005 Non-Final Rejection; Feb. 7, 2006 Amendment; July 12, 2006 Notice of Allowability</p>	Plain and ordinary meaning.	<p><u>'237 Patent (Ex. A):</u> Abstract; Figures 1-3; 1:60-2:2, 3:4-20, 5:19-37, 8:35-59, 15:53-16:14; Claims 1, 3, 4, 5, 7, 8, 9, 11, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 36, 37, 38, 39.</p> <p><u>'641 Patent (Ex. B):</u> Claims 1, 3, 4, 5, 7, 8, 9, 11, 12, 13, 14.</p> <p><u>'237 Patent Prosecution History Excerpts (Ex. C):</u> March 26, 2004 Non-Final Rejection; July 29, 2004 Amendment; Jan. 13, 2005 Final Rejection; April 13, 2005 Amendment Under 37 C.F.R. 1.116; April 28, 2005 Advisory Action;</p>

¹ For citations to documents filed before the USPTO, Plaintiffs and Defendant rely upon each of the sections within the Asserted Patent specification or prior art cited by Plaintiffs or the Examiner in the document, as well as what Plaintiffs or the Examiner had to say in citing each such section for support.